

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

JOHN DOE,

Plaintiff,

v.

**WILLIAM LEE, Governor of the State
of Tennessee, in his official capacity; and
DAVID B. RAUSCH, Director of the
Tennessee Bureau of Investigation, in his
official capacity.**

Defendants.

No. 3:22-cv-00569

District Judge Richardson

Magistrate Judge Newbern

DECLARATION OF SHELLY SMITHERMAN

I, Shelly Smitherman, state as follows:

1. My name is Shelly Smitherman, and I am over the age of eighteen (18), of sound mind, and competent to make the statements contained in this declaration.
2. I am an Assistant Special Agent in Charge of the Criminal Intelligence Unit in the Tennessee Bureau of Investigation ("TBI").
3. As part of my duties, I oversee the administration of the Tennessee sex offender registry.
4. I have been employed with the TBI for the past 20 years.
5. For the past 6 years, I have been responsible for overseeing the administration of the Tennessee sex offender registry.
6. Working with an outside vendor, TBI was able to determine how many offenders who are subject to the Tennessee Sexual Offender and Violent Sexual Offender Registration,

Verification, and Tracking Act of 2004, Tenn. Code Ann. §§ 40-39-201 – 218 (“the Act”) live in each of Tennessee’s 95 counties.

7. As of August 15, 2022, here are the results of that determination:

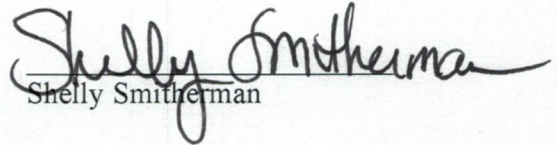
- a. No County Listed: 4
- b. Anderson: 121
- c. Bedford: 135
- d. Benton: 65
- e. Bledsoe: 37
- f. Blount: 190
- g. Bradley: 257
- h. Campbell: 93
- i. Cannon: 45
- j. Carroll: 90
- k. Carter: 84
- l. Cheatham: 93
- m. Chester: 44
- n. Claiborne: 64
- o. Clay: 28
- p. Cocke: 133
- q. Coffee: 176
- r. Crockett: 66
- s. Cumberland: 136
- t. Davidson: 1,401
- u. Decatur: 34
- v. Dekalb: 45
- w. Dickson: 127
- x. Dyer: 107
- y. Fayette: 72
- z. Fentress: 65
- aa. Franklin: 96

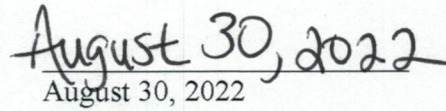
bb.	Gibson: 170
cc.	Giles: 85
dd.	Grainger: 49
ee.	Greene: 138
ff.	Grundy: 29
gg.	Hamblen: 125
hh.	Hamilton: 547
ii.	Hancock: 22
jj.	Hardeman: 82
kk.	Hardin: 79
ll.	Hawkins: 98
mm.	Haywood: 54
nn.	Henderson: 91
oo.	Henry: 123
pp.	Hickman: 94
qq.	Houston: 28
rr.	Humphreys: 81
ss.	Jackson: 24
tt.	Jefferson: 134
uu.	Johnson: 36
vv.	Knox: 608
ww.	Lake: 18
xx.	Lauderdale: 90
yy.	Lawrence: 136
zz.	Lewis: 43
aaa.	Lincoln: 68
bbb.	Loudon: 81
ccc.	Macon: 83
ddd.	Madison: 406
eee.	Marion: 89
fff.	Marshall: 72

ggg.	Maury: 204
hhh.	McMinn: 135
iii.	McNairy: 89
jjj.	Meigs: 44
kkk.	Monroe: 136
lll.	Montgomery: 331
mmm.	Moore: 16
nnn.	Morgan: 37
ooo.	Obion: 95
ppp.	Overton: 48
qqq.	Perry: 22
rrr.	Pickett: 8
sss.	Polk: 41
ttt.	Putnam: 134
uuu.	Rhea: 148
vvv.	Roane: 125
www.	Robertson: 173
xxx.	Rutherford: 372
yyy.	Scott: 76
zzz.	Sequatchie: 43
aaaa.	Sevier: 207
bbbb.	Shelby: 2,405
cccc.	Smith: 41
dddd.	Stewart: 39
eeee.	Sullivan: 285
ffff.	Sumner: 249
gggg.	Tipton: 106
hhhh.	Trousdale: 29
iiii.	Unicoi: 39
jjjj.	Union: 53
kkkk.	Van Buren: 27

llll. Warren: 110
mmmm. Washington: 241
nnnn. Wayne: 32
oooo. Weakley: 83
pppp. White: 80
qqqq. Williamson: 74
rrrr. Wilson: 143

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
and correct.


Shelly Smitherman


August 30, 2022